REMARKS

I. Introduction

Claims 1-40 are pending in the present application. Claim 29 has been amended. In a January 13, 2005, Office Action (herein "Office Action"), Claims 1-40 were rejected. The Examiner rejected applicants' Claims 1-16, 19, 23-27, 29-31, and 35-40 under 35 U.S.C. § 102(e) as anticipated by U.S. Patent No. 5,982,362 to Crater (hereinafter "Crater"). Additionally, the Examiner rejected applicants' Claims 17 under 35 U.S.C. § 103(a) as obvious over Crater in view of U.S. Patent No. 6,698,021 to Amini (hereinafter "Amini"). Claims 18 and 20 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Crater in view of Amini and further in view of U.S. Patent No. 5,732,232, issued to Brush (hereinafter "Brush"). Claims 21, 28, 32, and 34 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Crater in view of U.S. Patent No. 6,504,479, issued to Lemons (hereinafter "Lemons"). Claim 22 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Crater in view of U.S. Patent No. 5,758,340, issued to Nail (hereinafter "Nail"). Claim 33 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Crater in view of U.S. Patent No. 5,086,385, issued to Launey (hereinafter "Launey").

For the following reasons, applicants respectfully submit that Claims 1-40 are not anticipated by Crater and are not obvious over Crater in view of Amini, Brush, Lemons, or Nail, because the prior art, alone or in combination, fails to teach or suggest generating a graphical user interface responsive to a request for controlling a remote device. Prior to discussing more detailed reasons why applicants believe that all of the claims of the present application are allowable over the cited references, a brief description of the present invention and the cited references is presented.

LAW OFFICES OF
CHRISTENSEN O'CONNOR JOHNSON KINDNESS PLLC
1420 Fifth Avenue
Suite 2800
Seattle, Washington 98101
206.682.8100

A. Summary of the Present Invention

The present invention is related to a system and method for interacting with a remote device. More particularly, a premises server obtains a request corresponding to controlling one or more identifiable remote devices. In response to the request, the premises server dynamically generates a graphical user interface operable to control the remote devices. Control of the remote devices can include accessing the remote device and issuing instructions. Thereafter, the premises server obtains user initiated control instructions from the graphical user interface. The premises server then transmits remote device control data corresponding to the user control instructions, and obtains remote device data generated by the remote device.

In one example of the present invention, a system and method for dynamically generating a user interface for controlling at least one remote device is provided through a central server in communication with the remote device. In accordance with the embodiment, an authorized user accesses the premises server via a central server and requests access to monitoring device data or other integrated information system data. The premises server then dynamically generates a graphical user interface to be viewed by the user via the client computing device.

Numerous advantages may be realized by the system and method recited in the claims of the present application. In one aspect, the utilization of the dynamically generated user interfaces allows graphical user interface generation to be centralized in a server associated with a number of discrete monitoring devices in the monitored network. In another aspect, the centralized nature of the server allows software fixes or updates to the server or servers to be realized immediately throughout the monitoring network, instead of installing software on each and every monitoring computer in the network. Additional advantages may also be realized within embodiments of the present invention.

LAW OFFICES OF
CHRISTENSEN O'CONNOR JOHNSON KINDNESS PLLC
1420 Fifth Avenue
Suite 2800
Seattle, Washington 98101
206.682.8100

B. U.S. Patent No. 5,982,362 to Crater et al

Crater is purportedly directed towards an integrated control system comprising one or more controllers each equipped to perform a control function to gather data relevant to the control functions. In accordance with the teachings of Crater, each controller includes computer storage for transmitting one or more pre-configured web pages. The web pages include, among other data, applet instructions that cause a properly equipped remote monitoring computer to display data in a dynamic fashion, or hyperlinks to other web pages, objects or applets. Once a user requests information related to a controller, the remote computer generates a visual display corresponding to the pre-configured web pages. Nevertheless, Crater fails to teach or suggest generating a graphical user interface responsive to a request for controlling a remote device

II. The Claims Distinguished

A. Claims 1, 25, 29, and 37

For purposes of this discussion, independent Claim 1, 25, 29, and 37 will be discussed together because the limitations discussed herein are similar for each claim. Claim 1 reads as follows:

> 1. A method for interacting with a remote device comprising:
>
> obtaining a request corresponding to controlling at least one identifiable remote device;
>
> generating a graphical user interface responsive to said request, the graphical user interface being operable to control the remote device, wherein controlling said device includes accessing said remote device and issuing instructions;
>
> obtaining user control instructions from said graphical user interface;
>
> transmitting remote device control data corresponding to said user control instructions; and
>
> obtaining remote device data generated by said remote device.

LAW OFFICES OF
CHRISTENSEN O'CONNOR JOHNSON KINDNESS PLLC
1420 Fifth Avenue
Suite 2800
Seattle, Washington 98101
206.682.8100

Similarly, Claim 25 reads as follows:

25. A computer-readable medium having computer-executable components for dynamically interacting between at least one remote device and a computing device, comprising:

a user interface application operable to dynamically generate a graphical user interface corresponding to the remote device in response to a request for interaction with the remote device;

a device interface application operable to obtain device data from the remote device, and operable to manipulate said data; and

a data transmittal application operable to transmit said data to the computing device, and to facilitate communication between the remote device and the computing device.

Claim 29, as amended, reads as follows:

29. In a computer system including a remote device in communication with a central server via a communication network, a method for dynamically generating a user interface for controlling at least one pre-selected remote device comprising:

obtaining a request to control at least one pre-selected remote device from a remote device by a central server, one or more program modules corresponding to said request to control at least one pre-selected remote device from a plurality of program modules in response to said request, said program module operable to control said remote device;

transmitting a screen interface with said program module;

wherein said screen interface containing said program module is operable to generate a graphical user interface when loaded within a browser application on the remote device.

Claim 37 reads as follows:

37. A system for dynamically generating a user interface for controlling at least one remote device comprising:

at least one remote device operable to receive control commands and to transmit monitoring data based on said control commands;

LAW OFFICES OF
CHRISTENSEN O'CONNOR JOHNSON KINDNESS PLLC
1420 Fifth Avenue
Suite 2800
Seattle, Washington 98101
206.682.8100

a server computer in communication with said remote device, said server computer operable to dynamically generate a graphical user interface based on said remote device;

a client computer in communication with said server computer, said client computer operable to display said graphical user interface, and request said control commands.

As recited above, Claims 1, 25, 29, and 37 are directed to a system and method for interacting with a remote device. Each of the claims recites the dynamic generation of a graphical user interface in response to a user request. As recited in Claims 1, 25, 29, and 37, the invention facilitates the centralized generation of graphical user interfaces associated with a request to access discrete monitoring devices in a monitored network. The centralized server configuration mitigates the need to maintain device-specific user interfaces at each monitoring computer in the network. Additionally, the centralized nature of the server allows software fixes or updates to be centrally processed in the monitoring network.

Crater does not teach generating a graphical user interface responsive to a request for controlling a remote device. Instead, Crater purportedly teaches a system in which individual controllers maintain pre-determined or pre-configured web pages 40 with a set of applets for monitoring a specific device. When loaded on a monitoring computer 50, the pre-determined or pre-configured web pages 40 allow for the passive display of data via a browser. (Col. 8, lines 19-37). However, because the pre-configured web pages are device specific, Crater teaches that the controller would maintain a predefined set of applets for an attached device with each web page and would provide the predefined set of applets with the web page to a remote monitoring computer. (Col. 8, lines 26-33). The same web page with the predefined set of applets would be transmitted to the remote monitoring computer in response to each remote monitoring computer request. (Col. 8, lines 32-33). Crater in no way teaches the configuration

LAW OFFICES OF
CHRISTENSEN O'CONNOR JOHNSON KINDNESS PLLC
1420 Fifth Avenue
Suite 2800
Seattle, Washington 98101
206.682.8100

of a web page based on the devices the user would wish to access. Accordingly, Crater does not teach the actual generation of an interface based upon a request from a monitoring station.

As stated above, Claims 1, 25, 29, and 37 recite "generating a graphical user interface responsive to said request." Because Crater transmits the same device specific web page containing the same predefined set of pre-configured applets for each request, Crater does not generate a graphical user interface in response to a monitoring request. The Office Action contends, however, "that Crater does teach generating a graphical user interface responsive to said request." (Office Action, p.15). As shown above, Crater transmits the same device specific web page containing the same predefined set of pre-configured applets that are not responsive to a request. Accordingly, Crater does not teach generation of a graphical user interface in response to a monitoring request.

Under Section 102(e), a claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. *Verdegaal Bros. v Union Oil Co. of California*, 814 F.2d 628, 631 (Fed. Cir. 1987) (February 2003). Applicants respectfully submit that Crater fails to expressly or inherently teach, disclose, or suggest each and every element of Claims 1, 25, 29, and 37. As explained above, Crater fails to disclose or suggest generating a graphical user interface responsive to a request for controlling a remote device. Accordingly, applicants respectfully request withdrawal of the pending rejection under 35 U.S.C. § 102 with regard to Claims 1, 25, 29, and 37.

B. Claims 2-24, 26-28, 30-36, and 38-40

Dependent Claims 2-16, 19, 23-24, 26-27, 30-31, 35-36, and 38-40 were rejected under 35 U.S.C. § 102(e) as anticipated by U.S. Patent No. 5,982,362 to Crater. Additionally, the Examiner rejected applicants' Claims 17 under 35 U.S.C. § 103(a) as obvious over Crater in view of Amini. Claims 18 and 20 were rejected under 35 U.S.C. § 103(a) as being unpatentable over

LAW OFFICES OF
CHRISTENSEN O'CONNOR JOHNSON KINDNESS PLLC
1420 Fifth Avenue
Suite 2800
Seattle, Washington 98101
206.682.8100

Crater in view of Amini and further in view of Brush. Claims 21, 28, 32, and 34 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Crater in view of Lemons. Claim 22 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Crater in view of Nail. Claim 33 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Crater in view of Launey. Because a dependent claim carries each and every limitation of the claim it depends on, the references, either alone or in combination, fail to teach or suggest each of the limitations as discussed above. Applicants further submit that the additional cited references fail to address the deficiencies associated with Crater. Accordingly, for this reason, applicants respectfully submit that the rejection of Claims 2-24, 26-28, 30-36, and 38-40 is in error and request that it be withdrawn.

CONCLUSION

Based on the above-referenced arguments, applicants respectfully submit that all pending claims of the present application are patentable and allowable over the cited and applied references. Because the cited and applied references fail to teach or suggest generating a graphical user interface responsive to a request for controlling a remote device, applicants respectfully request withdrawal of the rejections of the claims and allowance of the present application.

///

///

///

///

///

///

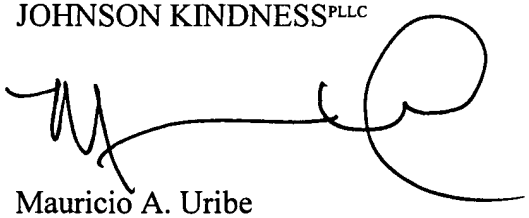
///

LAW OFFICES OF
CHRISTENSEN O'CONNOR JOHNSON KINDNESS PLLC
1420 Fifth Avenue
Suite 2800
Seattle, Washington 98101
206.682.8100

If any questions remain, applicants request that the Examiner contact the undersigned at the telephone number listed below.

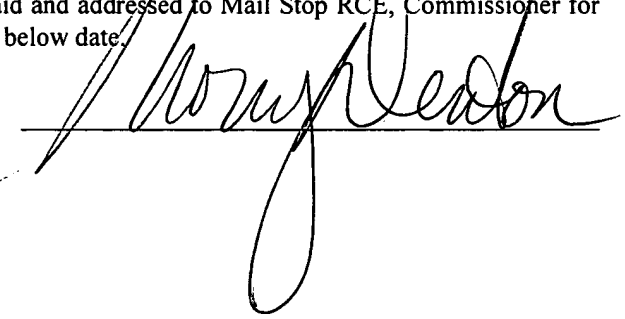
Respectfully submitted,

CHRISTENSEN O'CONNOR
JOHNSON KINDNESS^{PLLC}



Mauricio A. Uribe
Registration No. 46,206
Direct Dial No. 206.695.1728

I hereby certify that this correspondence is being deposited with the U.S. Postal Service in a sealed envelope as first class mail with postage thereon fully prepaid and addressed to Mail Stop RCE, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on the below date.

Date: July 12, 2005 

MAU/ACF:md

LAW OFFICES OF
CHRISTENSEN O'CONNOR JOHNSON KINDNESS^{PLLC}
1420 Fifth Avenue
Suite 2800
Seattle, Washington 98101
206.682.8100